

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JOAN MULLIN, ADMINISTRATRIX OF  
THE ESTATE OF ROBERT MULLIN,  
deceased and JOAN MULLIN,  
individually,

Plaintiffs,

v.

ADMINISTRATOR KAREN BALICKI, in  
her personal and individual capacities  
representing the State of New Jersey, the  
Department of Corrections of the State of  
New Jersey, South Woods State Prison, and  
Central Reception & Assignment Facility  
(C.R.A.F.), DIRECTOR ROBERT  
PATTERSON, in his personal and  
individual, representing the State of New  
Jersey, the Department of Corrections of  
the State of New Jersey, South Woods State  
Prison, and Central Reception &  
Assignment Facility (C.R.A.F.) DIRECTOR  
MARIE DUNLAP-PRYCE, in her personal  
and individual capacities, representing the  
State of New Jersey, the Department of  
Corrections of the State of New Jersey,  
South Woods State Prison, and Central  
Reception & Assignment Facility  
(C.R.A.F.), JANE BYRD, L.P.N., in her  
personal and individual capacities, ERIN  
MARUSKY, R.N., in her personal and  
individual capacities, OFFICER  
NICHOLAS DIMLER, in his personal and  
individual capacities, OFFICER ROBERT  
RUSSO, in his personal and individual  
capacities, CHIEF RALPH YANSEK, in  
his personal and individual capacities, Lt.  
DUDICH, in his personal and individual  
capacities, SGT. B. STERN, in his personal  
and individual capacities, SGT. THOMAS  
SPENCE, in his personal and individual  
capacities, OFFICER ERIC LARGE, in his  
personal and individual capacities,  
KINTOCK GROUP, JOHN DOES 4-10 (as  
yet unidentified and unknown  
governmental, county, or state officials,  
supervisors, agents or employees) in their  
personal, individual and professional  
capacities, ABC ENTITIES 1-10 (as yet  
unidentified and unknown governmental  
entities

Defendants.

Civ. No. 3:11-cv-00247

NOTICE OF MOTION  
TO AMEND THE COMPLAINT

**ON NOTICE TO:**

Office of the Attorney General  
Division of Law  
25 Market Street, P.O. Box 116  
Trenton, NJ 08625-0116  
Attn: Lucy Elizabeth Fritz, Esq.  
Daniel M. Vannella, Esq.

*Attorney for State of New Jersey, Dept. of Correction of State of NJ, South Woods State Prison, C.R.A.F., Administrator Karen Balicki, Director Robert Patterson, Director Marie Dunlap-Pryce, and Jane Byrd, L.P.N.*

John J. Welch, Esq.  
2329 State Highway 43, Suite 103  
Manasquan, NJ 08736-1442  
*Attorney for Kintock Group*

David C. Donohue, Esq.  
Farkas & Donohue  
389 Passaic Ave., 3d Floor  
Fairfield, NJ 07004  
*Attorneys for Jane Byrd, LPN and UMDNJ*

**PLEASE TAKE NOTICE**, that on September 15, 2014 at 9:00a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorney for plaintiffs Joan Mullin, Administratrix of the Estate of Robert Mullin will apply to the United States District Court, District of New Jersey, before the Hon. Lois H. Goodman for an Order permitting amendment of the complaint to name individuals and add new factual allegations.

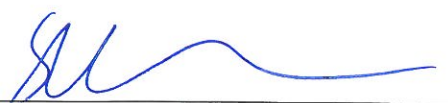
**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely upon the Certification of Shelley L. Stangler, Esq, and accompanying brief and exhibits in support of the motion.

Oral argument is requested.

A form of proposed Order is enclosed.

This motion is filed pursuant to the Order of the Hon. Mary L. Cooper, Docket Entry #204.

**SHELLEY L. STANGLER, P.C.**  
Attorney for Plaintiffs

By:   
**SHELLEY L. STANGLER, ESQ.**

Dated: August 22, 2014